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Petroleum Marketers Association • Convenience Store Association

April 11, 2008

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Executive Director

Mark Larson

Mr. Bob Lucht  
Storage Tank Program  
Herschler Building, 4W  
122 West 25<sup>th</sup> Street  
Cheyenne, WY 82002

Re: Class B Operator Training Final Recommendation

Dear Mr. Lucht,

The Wyoming Petroleum Marketers would like to propose the following final recommendations for your consideration. As we have gone through the discussion/learning process and, given the many exchanges of correspondence during the past few weeks, we believe that the exhaustive due diligence afforded us by the Department has allowed WPMA to fully understand the Department's rationale in developing the regulations. Accordingly, this is our final letter of recommendation.

The below recommendations address EPA required state compliance mandates, incorporate existing regulation historical enforcement data, consider technological protection systems and balance operator training effectiveness. We have listened to the Department's need for daily on-site operational monitoring assurances by beefing up frontline employee training and recognition responsibilities. In turn, we are asking the Department to allow supervisory oversight expansions that reflect technological monitoring capabilities combined with adding a rigid monthly supervisor inspection. Here are the recommendations.

1. Add to the existing proposed Class C Operator training requirements:
  - A thorough understanding of delivery procedures and hazards.
  - The ability to recognize and differentiate between alarm systems and understand the significance each alarm represents.
  - The location and function of leak detection and cathodic protection devices and systems.
2. Expansion of Class B Operator oversight for up to 12 units.
3. Add the requirement that a Class A or Class B Operator must inspect every facility monthly with documentation of date, time and any corrective action needed to be maintained on-site.

By assuring that the employee with the primary responsibility for addressing emergencies has a broader understanding of all system functions and how they interact, along with increased awareness of operational practices, the initially proposed reliance on more frequent Class B Operator oversight

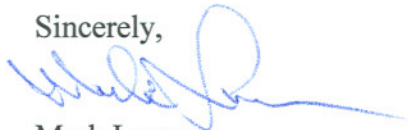
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Terri A. Lorenzon, Director  
Environmental Quality Council

should be more than compensated by less frequent but more thorough Class B Operator oversight. Having better trained frontline employees with enhanced monthly inspections should allow for substantially similar results as anticipated in the originally proposed model. We believe that the Department's historical violation data will support allowing these changes to be considered.

Thank you for taking the time and effort to help me understand the Department's reasoning for the proposed operator training regulations. I understand now why previously proposed recommendations fell short of what the Department recognized were issues that must be addressed. As a result of your significant demonstration of patience and desire to assure a thorough mutual understanding, the potential for effective and pragmatic compromise has been seeded.

Please let me know if I may clarify any of the above recommendations or the conclusions utilized in developing them.

Sincerely,



Mark Larson  
Executive Director

**Cc:** Mr. Dennis Boal, Chairman  
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